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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11
: :
LEHMAN BROTHERS HOLDINGS, INC., et al., : Case No. 08-13555 (JMP)
: :
Debtors. : Jointly Administered
: :

**VERIFIED STATEMENT OF PEPPER HAMILTON LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pepper Hamilton LLP (“Pepper”), as counsel to the parties designated herein,
hereby submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy
Procedure, and states as follows:

1. Pepper has been retained to represent various creditors and parties in
interest (collectively, the “Entities”) in these jointly administered chapter 11 cases. Some or all
of the Entities may hold claims against the Debtors. The Entities are listed on Exhibit A, which
is attached hereto and made a part hereof.

2. Each of the Entities has requested that Pepper represent them in the
Debtors’ chapter 11 cases.

3. Upon information and belief, as of the date hereof, Pepper does not hold any claims against or any interest in the Debtors.

4. The Entities currently hold or will hold unsecured pre-petition claims, rejection damage claims and/or administrative priority claims. The full amount of each of the Entities' claims is undetermined at this time.

5. Pepper reserves the right to revise and supplement this statement as necessary.

I, Francis J. Lawall, hereby certify that this Verified Statement is true and accurate to the best of my knowledge, information, and belief.

Dated: May 12, 2009

PEPPER HAMILTON LLP


By: /s/ Francis J. Lawall 
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EXHIBIT A

1. EnCana Corporation and EnCana Oil & Gas Partnership
Box 28560
Calgary, AB T2P 2S5, Canada
2. ING Bank, FSB
ING Direct - Legal Department
802 Delaware Avenue
10th Floor, Wilmington, DE 19801
3. Pitcairn Property Holdings, Inc.
165 Township Line Road
Suite 1500,
Jenkintown, PA 19046
4. RCN New York Communications LLC
d/b/a RCN Metro Optical Networks
RCN Telecom Services, Inc.
196 Van Buren Street
Herndon, VA 20170